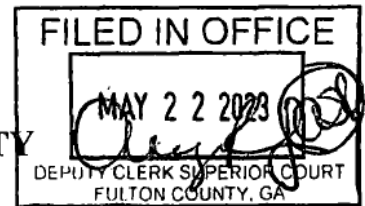


## **EXHIBIT B-167**



IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

IN RE: SPECIAL PURPOSE GRAND JURY

Case No. 2022-EX-000024  
Judge Robert C.I. McBurney

**VERIFIED APPLICATION FOR *PRO HAC VICE* ADMISSION**

Pursuant to Georgia Uniform Superior Court Rule 4.4, I, Fred M. Wertheimer, hereby apply to this Honorable Court for admission to practice in the above-styled case *pro hac vice*. In support of this application, Applicant states as follows:

1. I reside at:



2. My business address is:  
Democracy 21 Education Fund  
2000 Massachusetts Avenue NW  
Washington, D.C. 20036  
Phone: (202)-355-9600  
fwertheimer@democracy21.org

3. I have been retained to represent the following client(s):

Donald Ayer, John Farmer, Stuart Gerson, Tanya Miller, J. Tom Morgan, Sarah Saldaña, William F. Weld, and Shan Wu	c/o Brian Kammer 241 E Lake Dr Decatur, GA 30030 (678) 235-4964
--	--

4. I am a member in good standing of the following jurisdictions:

Jurisdiction: District of Columbia Bar  
Date admitted: 7/13/1971  
Still admitted: Yes  
Bar/Registration No.: 154211.

5. I have never been a member of the State Bar of Georgia.

6. I have never been denied *pro hac vice* admission in Georgia.

7. I have never had *pro hac vice* admission revoked in Georgia.

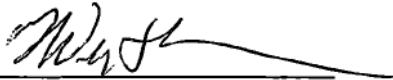
8. I have never been sanctioned or formally disciplined by a court in Georgia.

9. I have never been the subject of any formal disciplinary proceedings.

10. I have never been formally held in contempt, or otherwise sanctioned by a court in a written order, for disobedience to its rules or orders.

11. In the past two years I have not filed for *pro hac vice* admission in Georgia.
12. I have reviewed and am familiar with the Georgia Rules of Professional Conduct and all court rules relevant to practice before the court in which I am seeking admission.
13. My local sponsor is:  
Brian S. Kammer  
Bar No. 406322  
241 E Lake Dr  
Decatur, GA 30030  
678-235-4964
14. When I file my application, I will forward a copy to the State Bar of Georgia along with a check or money order made payable to the State Bar of Georgia in the amount of \$275, as this is my first application filed this calendar year.

I, Fred M. Wertheimer, applicant in the foregoing Verified Application for *Pro Hac Vice* Admission, hereby verify the facts contained therein are true and accurate to the best of my knowledge.



This 19<sup>th</sup> day of May, 2023

Kiana B. Persons

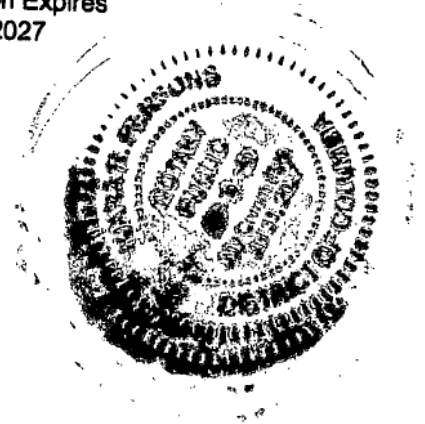
Applicant Sworn to before me this 19<sup>th</sup> day of May, 2023

Kiana B. Persons

Notary Public

My commission expires

My Commission Expires  
July 31, 2027



**IN THE SUPERIOR COURT OF FULTON COUNTY**

**STATE OF GEORGIA**

**IN RE:  
SPECIAL PURPOSE GRAND JURY**

**Case No. 2022-EX-000024**

**CERTIFICATE OF SERVICE**

This is to certify that I have caused a true and correct copy of the foregoing document to be served via electronic mail to the following counsel of the parties:

Jennifer L. Little  
Jennifer Little Law, LLC  
Jlittle@jllaw.com

Kieran J. Shanahan  
Shanahan Law Group, PLLC  
kieran@shanahanlawgroup.com

Drew Findling  
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drew@findlinglawfirm.com  
marissa@findlinglawfirm.com

Fani T. Willis  
Will Wooten  
Office of the District Attorney  
Fani.willisda@fultoncountyga.gov  
Will.wooten@fultoncountyga.gov

This 22nd day of May 2023.



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Brian Kammer  
Ga. Bar No. 406322  
241 E Lake Dr  
Decatur, GA 30030  
Tel: (678) 235-4964  
attybkammer@gmail.com